

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

V.

BOBBIE BROWN

)
)
)
)
)
)
)

08 CR 453-1

Judge Anderson

Magistrate Judge Cole

MOTION TO ENLARGE CONDITIONS OF BOND

Bobbie Brown, by attorney Michael James Falconer, moves to enlarge the conditions of his bond.

1. Bobbie Brown appeared before Magistrate Judge Cole on or about July 1, 2008 where his bond was set to include a condition of home incarceration.
2. Mr. Brown has primary financial responsibility for nine children, including five grandchildren. He needs to seek work so that he can support them.
3. In this white-collar case of mortgage fraud, the twenty other defendants were released, most on their own recognizance.
4. Additionally, Mr. Brown's bond conditions forbid him from communicating with Tish Tucker. He has a child with Ms. Tucker and it is necessary that they communicate about child welfare issues. Mr. Brown undertakes not to discuss the case with Ms. Tucker

Respectfully submitted,

/s/ Michael James Falconer
One of the attorneys for Bobbie Brown

Michael James Falconer
35 East Wacker Drive
#650
Chicago, IL 60601
312.236.7177
mfalconer@prodigy.net